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*Attorneys for Movant/Judgment Creditor*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

In re:

NAJA T. FREENEY

Debtor.

(Chapter 7 Case)

No. 2:17-bk-09939-PS

DIANE M. MANN, CHAPTER 7  
TRUSTEE,

Movant/Judgment Creditor,

vs.

NAJA T. FREENEY,

Debtor/Judgment Debtor,

THE MEHAREEN LIMITED LIABILITY  
PARTNERSHIP dba 21<sup>ST</sup> CENTURY  
FAMILY MEDICINE,

Garnishee.

**APPLICATION FOR WRIT OF  
GARNISHMENT FOR EARNINGS OF  
JUDGMENT DEBTOR**

Diane M. Mann, Chapter 7 Trustee, by and through her attorneys undersigned, hereby applies, pursuant to A.R.S. §12-1598.03, for a Writ of Garnishment for Earnings of Debtor/Judgment Debtor Naja T. Freeney (SSN:xxx-xx-5788) (“**Judgment Debtor**”). In support hereof, Trustee respectfully represents:

1. Judgment Debtor filed a voluntary petition under Chapter 7 of Title 11, United States Code, on August 24, 2017.

2. Diane M. Mann is the duly appointed and acting Trustee in this case and Movant/Judgment Creditor (“**Judgment Creditor**”) in this matter.

1           3. This Court entered an Order Directing Debtor to Turn Over Estate Property  
2 (“**Judgment/Order**”) in favor of Judgment Creditor in the above referenced administrative proceeding on  
3 July 11, 2018 in the principal sum \$2,751.00.

4           4. The total amount of \$2,751.00 remains due and owing to the Judgment Creditor from the  
5 Judgment Debtor. Upon information and belief, Judgment Debtor is an employee of The Mehareen  
6 Limited Liability Partnership dba 21<sup>st</sup> Century Family Medicine (“**Garnishee**”). Garnishee’s address is  
7 believed to be the following:

8  
9                               The Mehareen Limited Liability Partnership  
10                              dba 21<sup>st</sup> Century Family Medicine  
11                              Attention: Payroll/Accounting  
12                              1343 North Alma School Road, Suite 160  
13                              Chandler, AZ 85224

14           6. Judgment Creditor has not received notice of the Judgment Debtor’s intent to enter into an  
15 agreement for debt scheduling with a qualified consumer credit counseling organization.

16           WHEREFORE, Diane M. Man, Chapter 7 Trustee and Judgment Creditor herein, respectfully  
17 requests that this Court issue a Writ of Garnishment for the earnings of Naja T. Freaney, Judgment Debtor,  
18 as satisfaction of debt to the above referenced bankruptcy estate in the amount of \$2,751.00.

19           RESPECTFULLY SUBMITTED this 6<sup>th</sup> day of August, 2018

20                               **LANE & NACH, P.C.**

21                               By: /s/ Adam B. Nach – 013622  
22                               Adam B. Nach  
23                               Jonathan C. Simon  
24                               Attorneys for Trustee  
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